

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS, TEXAS**

UNITED STATES OF AMERICA

VS.

CASEY ROSE

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CAUSE NO. 3: 14-CR-00367-B-26

**DEFENDANT'S MOTION FOR CONTINUANCE
OF SENTENCING HEARING**

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES the Defendant, Casey Rose, and files this Motion to Continue Sentencing Hearing, and would show the following:

I.

This case is presently set for sentencing on April 28, 2016 at 1:30 PM. Defendant's attorney is currently in jury trial in Cause Nos. 219-81690-2014 and 219-82997-2014, The State of Texas v. Jitender Singh, 291st District Court, Collin County Texas. The trial started Monday April 25, 2016 and based on the discovery, witness list and testimony, the trial will not conclude in time for Defendant's attorney to be physically present at Defendant's sentencing.

II.

This motion is not made for the purposes of delay, but so that the ends of justice may be served.

Based on the foregoing, defendant respectfully request that the Court grant a continuance of the sentencing date in this case to the week of May 2, 2016.

Respectfully submitted,

/s/ Joseph J. Padian
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Attorney for Defendant Casey Rose

CERTIFICATE OF CONFERENCE

I hereby certify that I conferred with Philip Meitl, counsel for the government, via email on April 25, 2016 and he states that the government is not opposed to the relief sought herein.

/s/ Joseph J. Padian
JOSEPH J. PADIAN

CERTIFICATE OF SERVICE

I hereby certify that on April 26, 2016, a true and correct copy of the foregoing was filed via the Court's CM/ECF system, thereby providing service on all counsel of record in this matter.

/s/ Joseph J. Padian
JOSEPH J. PADIAN